

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 1 of 10
		Revision 0

The original signatures are maintained on file.

POSITION/ORG	DELEGATE	DATE	
Safety Manager	Beth McBee	5/11/11	
Nuclear Compliance Director	Mark Wolf	5/11/11	
Environmental Manager	Judy King	5/11/11	
Procedure Writer	Barb Mizell	5/11/11	
Plant Manager [Approval Authority]	Larry Smith	5/12/11	
MODIFICATION LOG			
Revision Number	Description of Change	Pages Affected	Effective Date
0	<u>New Procedure:</u> Procedure to define the chemicals and process of applicability to the Risk Management Plan	All	5/16/11

ANSO MAY 18 2011

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 2 of 10
		Revision 0

Table of Contents	Page
1.0 INTRODUCTION	3
1.1 Purpose.....	3
1.2 Scope.....	3
2.0 INFORMATION.....	3
2.1 Terms and Definitions.....	3
2.2 General Information.....	6
3.0 RESPONSIBILITIES	7
3.1 Nuclear Compliance Director or Designee	7
4.0 PROCEDURE.....	7
5.0 RECORDS	8
6.0 REFERENCES	8
6.1 Source Requirements	8
6.2 Development References	8
7.0 ADDENDA.....	8
ATTACHMENT A – DETERMINATION OF RMP APPLICABILITY FOR POTENTIALLY REGULATED SUBSTANCES – METROPOLIS WORKS AS OF JUNE 2009	9

2012-11-09

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 3 of 10
		Revision 0

1.0 INTRODUCTION

1.1 Purpose

This procedure describes and documents how Metropolis Works (MTW) determined which processes and chemicals at the site are subject to the Risk Management Plan (RMP) regulations contained in 40 CFR 68, “Chemical Accident Prevention Provisions”.

This procedure works in conjunction with MTW-MAN-RMP-0001, *Metropolis Works Risk Management Plan Top Tier Manual*; the requirements of the RMP regulations contained in 40 CFR 68; Metropolis Works Process Safety Management (PSM) Program contained in MTW-MAN-PSM-001, *Process Safety Management Program*; Chapter 5.3.1 of the USNRC Source Materials License. ^(6.1.1); and Section 6.2.2, “Chemical Information,” of the *Integrated Safety Analysis Summary*.

1.2 Scope

This procedure establishes the process by which the site determines and maintains the applicability of RMP to the use and storage of affected chemicals and associated processes on site. See Section 2.2 for site applicability details.

2.0 INFORMATION

2.1 Terms and Definitions

2.1.1 Regulated Substance – Any substance listed pursuant to section 112 (r)(3) of the Clean Air Act as amended, in 40 CFR Part 68.130. Threshold quantities for substances regulated under the RMP Rule are listed in § 68.130.

2.1.2 Process – Any activity involving a Regulated Substance including any use, storage, manufacturing, handling, or the on-site movement of such chemicals, or combination of these activities. For purposes of this definition, any group of vessels which are interconnected, or separate vessels which are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 4 of 10
		Revision 0

2.1.3 Exemptions – For the purposes of determining whether more than a threshold quantity of a regulated substance is present at the facility, the following exemptions apply (40 CFR Part 68. 115, Threshold Determination):

- ***Concentrations of a regulated toxic substance in a mixture*** – §68.15 exempts from threshold determinations regulated toxic substances present in mixtures that have concentrations below one percent by weight of the mixture. If the concentration of the regulated substance in the mixture is one percent or greater by weight, but the site can demonstrate that the partial pressure of the regulated substance in the mixture under handling or storage conditions is less than 10 millimeters of mercury (mm Hg), the amount of that substance in the mixture need not be considered when determining threshold quantities. Review the non-exempted chemicals listed under § 68.115 (b)(1) as this list does not qualify for this exemption. Should an exemption be used this shall be documented.
- ***Concentrations of a regulated flammable substance in a mixture*** – § 68.115 exempts from threshold determinations regulated flammable substances present in mixtures that have concentrations below one percent by weight of the mixture. If the concentration of the flammable substance is one percent or greater by weight of the mixture, for threshold determinations, the entire weight of the mixture shall be treated as the regulated substance unless the site can demonstrate that the mixture itself does not have a National Fire Protection Association flammability hazard rating of 4.
- ***Naturally occurring hydrocarbon mixtures*** – Before entry into a natural gas processing plant or a petroleum refining process unit, regulated substances in naturally occurring hydrocarbon mixtures need not be considered when determining whether more than a threshold quantity is present at a stationary source. Naturally occurring hydrocarbon mixtures include any combination of the following: condensate, crude oil, field gas, and produced water as defined in §68.3.
- ***Articles*** – Regulated substances contained in articles are exempt from threshold determinations.
- ***Uses*** – Regulated substances, when in use for the following purposes, are exempt from threshold determinations:
 - Use as a structural component of the site;
 - Use of products for routine janitorial maintenance;

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 5 of 10
		Revision 0

- Use by employees of foods, drugs, cosmetics, or other personal items containing the regulated substance; and
- Use of regulated substances present in process water or non-contact cooling water as drawn from the environment or municipal sources, or use of regulated substances present in air used either as compressed air or as part of combustion.
- Activities in laboratories: If a regulated substance is manufactured, processed, or used in a laboratory at the site under the supervision of a technically qualified individual, the quantity of the substance need not be considered in determining whether a threshold quantity is present.
- Flammable Substances Used as Fuel or Held for Sale as Fuel at Retail Facilities. A flammable substance is excluded from threshold determinations when the substance is used as a fuel or held for sale as a fuel at a retail facility (40 CFR Part 68.126).

2.1.4 Program Levels – For the purposes of determining the RMP Program Level (1, 2 or 3) that applies to a covered process, the following criteria apply (§ 68.10, Applicability):

- Program 1 eligibility requirements – A covered process is eligible for Program 1 requirements as provided in §68.12(b) if it meets all of the following requirements:
 - (1) For the 5 years before the submission of an RMP, the process has not had an accidental release of a regulated substance where exposure to the substance, its reaction products, overpressure generated by an explosion involving the substance, or radiant heat generated by a fire involving the substance led to any of the following offsite: (i) death; (ii) injury; or (iii) response or restoration activities for an exposure of an environmental receptor; and
 - (2) The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under subpart B and §68.25 is less than the distance to any public receptor, as defined in §68.30; and
 - (3) Emergency response procedures have been coordinated between the site and local emergency planning and response organizations.
- Program 2 eligibility requirements – A covered process is subject to Program 2 requirements if it does not meet the eligibility requirements of either Program 1 or Program 3.

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 6 of 10
		Revision 0

- Program 3 eligibility requirements – A covered process is subject to Program 3 if the process does not meet the eligibility requirements of Program 1, and if either of the following conditions is met:

(1) The process is in NAICS code 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532; or

(2) The process is subject to the OSHA process safety management standard, 29 CFR 1910.119.

2.1.1 Management of Change (MOC) – A process by which changes to process chemicals, technology, equipment, procedures, and changes to facilities are properly managed, technical basis is documented, and evaluated against the licensing documents.

2.1.2 CFR – Code of Federal Regulations

2.1.3 MTW – Metropolis Works

2.1.4 OSHA – Occupational Safety and Health Administration

2.1.5 PHA – Process Hazardous Analysis

2.1.6 PSM – Process Safety Management

2.1.7 RMP – Risk Management Plan

2.2 General Information

2.2.1 MTW produces or uses for production purpose several chemicals contained in the RMP list of regulated substances.

2.2.1.1 Anhydrous Ammonia (NH₃)

2.2.1.2 Anhydrous Hydrofluoric acid (HF)

2.2.1.3 Fluorine (F₂)

2.2.1.4 Hydrogen Sulfide (used or stored below RMP threshold quantities)

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 7 of 10
		Revision 0

2.2.1.5 Hydrogen (used or stored below RMP threshold quantities)

2.2.1.6 Propane (used or stored below RMP threshold quantities)

2.2.2 Applicable boundaries were established based on the equipment that contains the Regulated Substance/compound plus the next step (exhibits the characteristics of the Regulated Substance). Applicable processes and boundaries:

NOTE - Utilities within these processes are not considered RMP processes. However, they, the utilities, may be components that are considered "Safety Features" and, therefore, maintained with Mechanical Integrity. Additional definitions of processes and boundaries are contained in MTW-DOC-PSM-0002, *Process Safety Management Program Applicability*.

2.2.3 Program Level 3 – All three subject chemicals and their respective covered processes are subject to the requirements of RMP Program Level 3, because the processes are in NAICS code 325188 (All Other Basic Inorganic Chemical Manufacturing) and the processes are subject to OSHA Process Safety Management (PSM).

3.0 RESPONSIBILITIES

3.1 Nuclear Compliance Director or Designee

3.1.1 Maintain the list of regulated substances applicable to MTW.

3.1.2 Review the site Management of Change (MOC) process to determine if reported chemical or process changes will affect any of the RMP program requirements.

4.0 PROCEDURE

Nuclear Compliance Director or Designee

4.1.1 Will revise and submit the RMP Applicability List in the following cases pursuant to §68.190, updates:

- All 9 sections must be submitted within 5 years of the most recent (last) update; or
- No later than 3 years after a newly regulated substance is first listed under 40 CFR 68.130; or
- Within 6 months of the start-up of a new process covered by RMP requirements; or

ADMINISTRATIVE PROCEDURE – LICENSE RELATED		
MTW-ADM-RMP-0001	RISK MANAGEMENT PLAN APPLICABILITY AND UPDATES	Page 8 of 10
		Revision 0

- No later than the date on which a new regulated substance is first present above a threshold quantity in a covered process. All applicable rule elements must be submitted BEFORE the threshold limit is attained; or
- No later than the date on which a regulated substance is first present above a threshold quantity in a new process; or
- Within 6 months of a change that requires a revised process hazard analysis (PHA) or hazard review; or
- Within 6 months of a change that requires a revised off-site consequence analysis.

5.0 RECORDS

None

6.0 REFERENCES

6.1 Source Requirements

- 6.1.1 *Honeywell Metropolis Works NRC Source License Sub 526*, Section 5.31, “Process Safety Management,” Requirements LIC-0551, LIC-0569
- 6.1.2 *Honeywell Integrated Safety Analysis Summary*, Section 6.2.2, “Chemical Information”
- 6.1.3 EPA 40 CFR 68, “Chemical Accident Prevention Provisions”

6.2 Development References

None

7.0 ADDENDA

- Attachment A – Determination of RMP Applicability for Potentially Regulated Substances Metropolis Works

11. The Honeywell Metropolis Facility does not store any Hydrogen Fluoride inventory in railcars that are not located on the Facility premises.

ANSI U.S.A. R.P.A. 8